

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

| | | |
|---|---|------------------|
| STEPHEN McCOLLUM, and SANDRA | § | |
| McCOLLUM, individually, and STEPHANIE | § | |
| KINGREY, individually and as independent | § | |
| administrator of the Estate of LARRY GENE | § | |
| McCOLLUM, | § | |
| PLAINTIFFS | § | |
| | § | |
| v. | § | CIVIL ACTION NO. |
| | § | 4:14-cv-3253 |
| | § | JURY DEMAND |
| BRAD LIVINGSTON, JEFF PRINGLE, | § | |
| RICHARD CLARK, KAREN TATE, | § | |
| SANDREA SANDERS, ROBERT EASON, the | § | |
| UNIVERSITY OF TEXAS MEDICAL | § | |
| BRANCH and the TEXAS DEPARTMENT OF | § | |
| CRIMINAL JUSTICE. | § | |
| DEFENDANTS | § | |

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO THE TDCJ DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

Plaintiffs respectfully request a 30 day extension to file their response to the TDCJ Defendants' Motion for Summary Judgment.

TDCJ and its individual Defendants filed a motion for summary judgment. *See* Doc. 288. Plaintiffs' deadline to respond is Friday, July 8, 2016. Plaintiffs respectfully seek a 30 day extension, so that the new response date would be Monday, August 8, 2016. Defendants have been granted several extensions of their filing deadlines. Docs. 282, 276, 261.

All Defendants have sought summary judgment in this case, which has numerous factual details and a large body of relevant deposition testimony. The TDCJ Defendants' motion is 132 pages long, and includes a 1,835 page appendix.

Presently, there is no trial date, so an extension will not result in undue delay or prejudice.

This motion is made for the reasons described, and not for the purposes of delay.

III. CONCLUSION

In accordance with the foregoing, Plaintiffs respectfully request that the Court extend Plaintiffs' time to respond to the TDCJ Defendants' Motion for Summary Judgment, Doc. 288, by 30 days, from July 8, 2016 to August 8, 2016.

Dated: July 1, 2016.

Respectfully submitted,

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By /s/ Jeff Edwards

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify that I corresponded with counsel for TDCJ and the individual TDCJ Defendants, and Defendants are unopposed to this motion.

By /s/ Scott Medlock
SCOTT MEDLOCK

CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Southern District of Texas.

By /s/ Jeff Edwards
JEFF EDWARDS